

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 2:19-cv-05697-JS
	:	
v.	:	
	:	
LISA REYNOLDS-BARBOUNIS	:	
	:	
Defendant.	:	
	:	

DECLARATION OF LISA REYNOLDS-BARBOUNIS

I Lisa Reynolds-Barbounis who resides at 1820 Kilbourne Place, Northwest, Washington D.C. 20010, in the United States of America do hereby make OATH and say at follows:

1. My name is Lisa Reynolds-Barbounis.
2. Today is October 10, 2020.
3. It is 12:08 P.M., Eastern Standard Time right now.
4. I just arrived at my attorney's law offices at 1835 Market Street, Philadelphia, Pennsylvania 19103.
5. At 11:00 A.M., this morning, October 10, 2020, I met with Daniel Pipes at 30th Street Station in Philadelphia, Pennsylvania to hear a proposal from Daniel Pipes.
6. I am currently a party to litigation involving Daniel Pipes in the Eastern District of Pennsylvania.
7. I am a Plaintiff in an action filed against Daniel Pipes, Greg Roman, and The Middle East Forum. This civil action was filed pursuant to severe and pervasive discrimination and harassment in the workplace to which I was subjected by Greg Roman and The Middle East Forum. The Case Number is 2:19-cv-05030-JDW.

8. I am a Counterclaim Defendant in a Counterclaim that The Middle East Forum filed against me in response to my civil action against The Middle East Forum. The Middle East Forum filed a Counterclaim against me based on false allegations of stealing money from The Middle East Forum. At no time did I steal money from The Middle East Forum. This Counterclaim was filed in connection with Case Number 2:19-cv-05030-JDW.
9. I am a Defendant in an action filed by The Middle East Forum against me. The allegations to which I have been accused are false and misleading. The Case Number is 2:19-cv-05697-JS.
10. I have contended from the moment that The Middle East Forum filed the first claim against me that all of the claims to which I have been accused by The Middle East Forum were filed for the singular purpose of retaliation.
11. The Middle East Forum filed the Counterclaim against me to harass and embarrass me and to force me to withdraw my lawful, supported claims of discrimination and harassment in the workplace.
12. The Middle East Forum filed a civil action against me. The judge assigned to this case is Judge Juan Sanchez. The Case Number is 2:19-cv-05697-JS. The Middle East Forum filed this case against me to harass and embarrass me and to force me to withdraw or reduce the amount of money that I would be willing to accept in my case against The Middle East Forum for discrimination and harassment in the workplace.
13. I have consistently accused The Middle East Forum of using the federal court system to file frivolous, false claims against me in an effort to harass and embarrass me and force me to withdraw my lawful case of discrimination and harassment in the workplace.
14. I filed a second Charge of discrimination and retaliation in the Equal Employment Opportunity Commission in Philadelphia, against The Middle East Forum, Daniel Pipes, and Greg Roman due to this retaliation connected with The Middle East Forum's campaign of using the federal court system to harass, embarrass and force me to withdraw my lawful claims of discrimination and harassment in the workplace.
15. I received a Dismissal and Notice of Rights from the EEOC and amended my complaint in the Eastern District of Pennsylvania (Case Number 2:19-cv-05030-JDW) to include the retaliation to which I have been subjected by The Middle East Forum, Daniel Pipes, and Greg Roman. My amended civil action complaint alleges that Defendants in this case have used the federal court system to subject me to a campaign of retaliating and to force me to withdraw my lawful claims of discrimination and harassment in the workplace.
16. On October 6, 2020, at 6:10 P.M., Daniel Pipes sent me an email. The email is copied and pasted in its entirety below:

Ms. Lisa Reynolds-Barbounis
2601 Pennsylvania Avenue, #1153
Philadelphia, PA 19130

Ms Barbounis:

I propose that you and I meet in person as soon as possible, one-on-one, in a public place in Philadelphia.

I will give you a written proposal to resolve amicably our legal matters. In addition, I will verbally explain to you why I am suggesting this specific way forward. All electronic devices must be shut off but bring paper and pen.

If you wish to pursue this idea, let me know and we can set up a time and place.

Daniel Pipes

17. On October 7, 2020 I responded to the email of Daniel Pipes. The entirety of my response is listed below.

Dr. Pipes,

I am willing to speak with you about resolving these cases. There are now three cases in the court, so we would need to discuss resolving all three. If I accept your offer resolving my case against you, would you withdraw your cases against me?

As you may be aware, I live in Washington, D.C. during the week and would not be available until this Saturday, October 10 or Sunday October 11. If one of those dates works for you, we could meet in Rittenhouse Square park.

Additionally, since my lawyer would not be present and I would assume he would not condone our meeting, would it be alright with you if I brought my father?

I look forward to hearing from you.

Lisa Reynolds Barbounis

18. On October 7, 2020, Daniel Pipes responded to my email. The entirety of Daniel Pipes' response is listed below.

Ms Barbounis:

Thank you for the reply. To answer your questions:

Yes, my proposal has both sides dropping all lawsuits with prejudice. I would like to explore this with you.

I suggest we meet on Saturday so that there is time, if needed, for a follow-up meeting on Sunday. How about 11 am?

I suggest 30th Street Station as it might be cold or inclement in the park.

Your father is welcome to accompany you to the meeting but on condition that he only sees us talking from some distance, and not hear our conversation. (For legal purposes, it is crucial that this be one-on-one.) I will come alone.

19. I attended the meeting to hear the proposal of Daniel Pipes on October 10, 2020 at 11:00 A.M., at 30th Street Station in Philadelphia, Pennsylvania.
20. Daniel Pipes did not offer me a proposal for settling the cases. Instead, Daniel Pipes informed me that he is about to file a third action case against me under the RICO statute.
21. Daniel Pipes said, "if you drop your case against us, I will drop our two cases against you and I will scuttle the third case in the works."
22. Daniel Pipes then said, "we are about to drop a RICO case against you."
23. I explained to Daniel Pipes that I am concerned about Greg Roman's abusive conduct. I explained to Daniel Pipes that I am concerned about Greg Roman doing what he did to me to another women in the future.
24. Daniel Pipes responded by asking, "what do you care what happens with Greg Roman and his relationship with The Middle East Forum. You don't work there anymore."
25. I answered that my objective is justice for what happened to me and I am also concerned about other women being subjected to similar abuse.
26. Daniel Pipes answered, "this is not about right and wrong. I am offering you a walk-away deal."
27. Daniel Pipes said that if I drop my case against The Middle East Forum, The Middle East Forum will drop its cases against me and scuttle the third RICO case which they are about to file.
28. I said to Daniel Pipes, "you know I did not steal anything from you. You know I did not take your database. You know that the allegations against me are false."
29. Daniel Pipes responded, "I think you are a fine person. I think you got trapped into thinking things were going to turn out differently."
30. Daniel Pipes told me that he would provide me with a letter absolving me of wrongdoing in connection with The Middle East Forum's cases against me. This included the counterclaim (2:19-cv-05030-JDW) and the case filed against me (2:19-cv-05697-JS).

31. Daniel Pipes also asked me to write a letter stating that "MEF is fine." I informed Daniel Pipes that I could not write a letter absolving Greg Roman of the years of abuse to which I was subjected.
32. The primary reason Daniel Pipes asked to meet with me was to threaten me with a third RICO lawsuit and to tell me that he would drop the other two lawsuits against me if I dropped my claims of discrimination and harassment in the workplace against The Middle East Forum.
33. I swear under penalty of perjury that the foregoing is accurate, true and correct.

Signature of Declarant: Lisa Barbounis

Name of Declarant: Lisa Barbounis

Date: 10 / 10, 2020